

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

In the Matter of the Search Regarding No. 4:21-mj-215

21-227-04

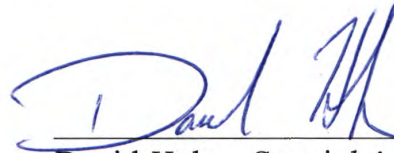
**REDACTED APPLICATION FOR
SEARCH WARRANT**

I, David Hohn, being duly sworn depose and say:

I am a Special Agent with the Homeland Security Investigations, currently stationed in Sioux Falls, South Dakota, and make this application for information about the location of the cellular telephones fully described in Attachment A, attached hereto and incorporated herein by reference (the "Target Telephones"), whose service provider is Verizon Wireless, Inc., a wireless telephone service provider, headquartered at 180 Washington Valley Road, Bedminster, New Jersey 07921 (the "Service Provider"). The location information to be seized is described in Attachment B, attached hereto and incorporated herein by reference.

I have reason to believe that said information will aid law enforcement in the location of persons suspected of committing criminal offenses, concerning violations of 18 U.S.C. §§ 2251, 2252, and 2252A (violations of law involving child pornography) and 18 U.S.C. § 2422(b) (enticement of a minor using the internet).

The facts to support a finding of probable cause are contained in my Affidavit filed herewith.



David Hohn, Special Agent
Homeland Security Investigations

Subscribed and sworn to before me, telephonically, on the 22nd day of November, 2021, at Sioux Falls, South Dakota.



VERONICA L. DUFFY
United States Magistrate Judge

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

In the Matter of the Search Regarding: No. 4:21-mj-215

21-227-04

REDACTED SEARCH WARRANT

TO: ANY AUTHORIZED LAW ENFORCEMENT OFFICER

An application by a federal law enforcement officer or an attorney for the government requests the search for information about the location of the cellular telephones fully described in Attachment A, attached hereto and incorporated herein by reference (the "Target Telephones"), whose service provider is Verizon Wireless, Inc., a wireless telephone service provider, headquartered at 180 Washington Valley Road, Bedminster, New Jersey 07921 (the "Service Provider"), regarding violations of 18 U.S.C. §§ 2251, 2252, and 2252A (violations of law involving child pornography) and 18 U.S.C. § 2422(b) (enticement of a minor using the internet). The location information to be provided is described in Attachment B, attached hereto and incorporated herein by reference.

To the extent that the information described in Attachment B (hereinafter, "Location Information") is within the possession, custody, or control of Service Provider, Service Provider is required to disclose the Location Information to the government beginning the date of issuance of the search warrant, until 30 days from the date of issuance of the search warrant.

In addition, Service Provider must furnish the government all information, facilities, and technical assistance necessary to accomplish the collection of the Location Information unobtrusively and with a minimum of interference with its services, including by initiating a signal to determine the location of the Target Cell Phone on its network or with such other reference points as may be reasonably available, and at such intervals and times directed by the government.

The government shall compensate Service Provider for reasonable expenses incurred in furnishing such facilities or assistance.

I find that the affidavit, or any recorded testimony, establish probable cause to permit the location search.

This warrant does not authorize the seizure of any tangible property. In approving this warrant, the Court finds reasonable necessity for the seizure of the Location Information. See 18 U.S.C. § 3103a(b)(2).

YOU ARE COMMANDED to execute this warrant on or before
December 6, 2021 _____ (not to exceed 14 days)

☐ in the daytime - 6:00 a.m. to 10:00 p.m.

☒ at any time in the day or night as I find reasonable cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to the undersigned Judge.

☐ Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized, for 30 days.

☐ for _____ days (*not to exceed 30*).

☐ until, the facts justifying, the later specific date of _____.

November 22, 2021 at 10:30 a.m. CST _____ at Sioux Falls, South Dakota
Date and Time Issued Telephonically



VERONICA L. DUFFY
United States Magistrate Judge

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REDACTED RETURN

Date and time warrant executed: _____

Copy of warrant and inventory left with: _____

Inventory made in the presence of: _____

Inventory of the property taken and name of any person(s) seized (attach additional sheets, if necessary):

CERTIFICATION

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.

David Hohn, Special Agent
Homeland Security Investigations

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

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REDACTED ATTACHMENT A

Property to Be Searched

1.

[REDACTED]

2.

[REDACTED]

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
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REDACTED ATTACHMENT B

Particular Things to be Seized

[REDACTED]

[REDACTED]

[REDACTED]

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
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**REDACTED AFFIDAVIT IN
SUPPORT OF AN APPLICATION
FOR A SEARCH WARRANT**

I, Special Agent David Hohn, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for a search warrant under Federal Rule of Criminal Procedure 41 and 18 U.S.C. § 2703(c)(1)(A) for information about **the location of the cellular telephones** [REDACTED]

[REDACTED] fully described in Attachment A, attached hereto and incorporated herein by reference (the “**Target Telephones**”), whose service provider is Verizon Wireless, Inc., a wireless telephone service provider, headquartered at 180 Washington Valley Road, Bedminster, New Jersey 07921. The location information to be seized is described herein and in Attachment B, attached hereto and incorporated herein by reference.

2. I am a Special Agent with the United States Department of Homeland Security, Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI) in Sioux Falls, South Dakota and have been duly employed in this position since January 2020. I am a graduate of the Criminal Investigator Training Program and ICE Special Agent Training Program at the Federal Law Enforcement Training Center. Prior to my employment with HSI, I was a United States Probation officer for eleven years. I have received specialized training pertaining to conducting criminal investigations, immigration and customs laws, investigative techniques, searching databases, conducting interviews, executing search warrants, and making arrests with respect to criminal violations of United States Code.

3. I have investigated and have assisted in the investigation of cases involving the possession, receipt, and distribution of child pornography in violation of United States Code 18 U.S.C. §§ 2251, 2252, and 2252A, involving violations of law involving child pornography and 18 U.S.C. § 2422(b),

entice ment of a minor using the internet. During my law enforcement career, I have become familiar with the modus operandi of persons involved in the illegal production, distribution, and possession of child pornography and those who engage in enticement of minors using the internet. Based on my experience and training, I am knowledgeable of the various means utilized by individuals who illegally produce, distribute, receive, and possess child pornography.

4. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

5. Based on the facts set forth in this affidavit, I believe there is probable cause to believe that violations of 18 U.S.C. §§ 2251, 2252, and 2252A have been committed, are being committed, and will be committed by [REDACTED]. There is also probable cause to believe that the location information described in Attachment B will enable the investigators to locate the devices being used to commit the criminal violations. Further it identifies locations where evidence of these criminal violations is being stored and will lead to the location of individuals who are engaged in the commission of these offenses.

PROBABLE CAUSE

6. On [REDACTED]

7. All [REDACTED]

- Name: [REDACTED]
- Phone number: [REDACTED]
- Phone number: [REDACTED]
- Email: [REDACTED]@gmail.com
- Back up email: [REDACTED]@gmail.com

8.

[REDACTED]

9.

[REDACTED]

- Name: [REDACTED]
- Email: [REDACTED]@gmail.com
- Created on: [REDACTED]
- Terms of Service IP: [REDACTED]
- Last Logins: [REDACTED]
- Account Recovery email: [REDACTED]@gmail.com
- Recover SMS: [REDACTED]

10.

[REDACTED]

- Name: [REDACTED]
- Email: [REDACTED]@gmail.com
- Created on: [REDACTED]
- Terms of Service IP: [REDACTED]
- Last Logins: [REDACTED]
- Account Recovery Email: [REDACTED]@gmail.com
- Recovery SMS: [REDACTED]

11.

[REDACTED]

12.

Filename:

Description:

Filename:

Description:

Filename:

Description:

Filename:

Description:

13.

14. On [REDACTED]

15. On [REDACTED]

16. On [REDACTED]

17. On [REDACTED]

18. [REDACTED]

19. In my training and experience, I have learned [REDACTED]

[REDACTED]

20. Based on my training and experience, I know [REDACTED]

[REDACTED]

21. Based on my training and experience, I know [REDACTED]

[REDACTED]

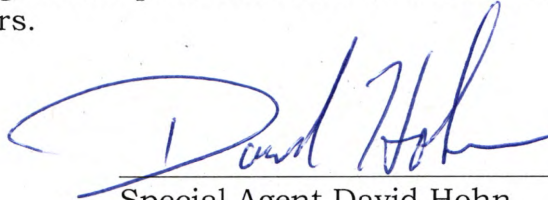
AUTHORIZATION REQUEST

22. Based on the foregoing, I request that the Court issue the proposed search warrant, pursuant to Federal Rule of Criminal Procedure 41 and 18 U.S.C. § 2703(c).

23. I further request that the Court direct the Service Provider to disclose to the government any information described in Attachment A that is within its possession, custody, or control. I also request that the Court direct the Service Provider to furnish the government all information, facilities, and technical assistance necessary to accomplish the collection of the information described in Attachment A unobtrusively and with a minimum of interference with its services, including by initiating a signal to determine the location of the Target Telephones on its network or with such other reference points as may be reasonably available, and at such intervals and times directed by the government. The government will compensate the service provider for reasonable expenses incurred in furnishing such facilities or assistance.

24. I further request that the information described in Attachment A be provided for the time period starting the date of issuance of the search warrant, until 30 days from the date of issuance of the search warrant.

25. I further request that the Court authorize execution of the warrant at any time of day or night, owing to the potential need to locate the Target Telephones outside of daytime hours.



Special Agent David Hohn
Homeland Security Investigations

Subscribed and Sworn to me, telephonically, on the 22nd day of
November, 2021, at Sioux Falls, South Dakota.



VERONICA L. DUFFY
United States Magistrate Judge

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[REDACTED]

[REDACTED]